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Louisville Branch

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NAACP

National Association for the Advancement of Colored People

A.P.C.D.
ADMINISTRATION

**Testimony of Louisville Branch NAACP to the Louisville Metro Air Pollution Control District
Regarding proposed STAR (Strategic Toxic Air Reduction) Project
Dated: February 14, 2005**

The NAACP has long been and continues to be a leading advocate for fairness and equality in the Louisville Metro community. As such, we as a civil rights organization along with environmental groups have been following the efforts of the Louisville Metro Air Pollution Control District and the Mayor regarding the safety of our environment, particularly air quality. We have studied the proponents of the STAR (Strategic Toxic Air Reduction) Project and recommend the Air Pollution Control Board enact the program. While we are supportive of the STAR project, there are four areas of concern we would like to be addressed and corrected:

Immediate Emphasis is needed on Health and Welfare Issues for the Community

The health and welfare of the citizens of the community must be the ultimate goal of the STAR project. According to the United States Environmental Protection Agency definition of environmental justice, Jefferson County is out of compliance with EPA standards. There is a disproportionate number of minorities located in close proximity to the Rubbertown Industries, who is responsible for 42% of all air emissions in Jefferson County. Environmental hazards that adversely effect health tend to be concentrated near or in poor and minority communities. There needs to be a health component included in the STAR project that addresses the health needs of citizens who live in close proximity to emissions.

Changes in the Permitting and Regulatory Process is Needed

Metro Government must place greater emphasis on health and welfare issues in the permitting and regulatory process. It is this Branch's recommendation that all companies include in their mission statement a strong commitment to environmental justice. It is also necessary that wording be included in all permits emphasizing due diligence of care for communities within five mile radius of their companies, the steps taken toward this effort, time frame for completion and evidence of success, for any facility that has been given permission by the Louisville Metro Air Pollution Control District to emit chemicals.

Mandatory Testing of Residents Following Accidental Chemical Releases

In the event of accidental chemical releases into the environment, we recommend blood sampling be offered to residents within a two-mile radius of the exposure and have the results reported and approved by the Louisville Metro Health Department.

Random Inspections of Companies

We recommend a minimum of four unannounced mandatory inspections per year with priority given to companies who have had at least one release within a year, three within two years.

We appreciate this opportunity to offer our position.

Sincerely,

Raoul Cunningham
President